

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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AUG 26 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Policies and Rules)
Governing Interstate Pay-Per-Call) CC Docket No. 96-146
and Other Information Services)
Pursuant to the Telecommunications)
Act of 1996)

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COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company (SWBT) fully supports the Commission's proposed amendments of its rules governing interstate pay-per-call information services. In response to Paragraph 41 of the Order and Notice of Proposed Rulemaking¹ (whether additional regulations are needed to protect consumers) SWBT submits that the rules need to be amended to explicitly provide that the information provider (IP) must validate an end user's calling card through the Local Exchange Carrier's (LEC's) Line Information Data Base (LIDB) before the IP can assess charges to the calling card. This will help prevent the billing of unauthorized charges to end users.

An end user's calling card contains the 10 digits of his/her telephone number. An end user also selects or is issued a four digit personal identification number (PIN) which validates that he/she is authorized to use the card. If an IP is not required to validate the calling card, anyone could enter in the ten digits of someone else's telephone number, then enter any four digits as the PIN number. The charges for the pay-for-call service would then appear on someone else's bill.

¹Released July 11, 1996.

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LIDB will only validate a calling card if correct PIN number is entered. Only the card holder will be able to enter the appropriate number. The amended rules should also require the true called number (800 or 900) to be entered for validation, thus allowing LIDB to check for 800 or 900 blocking. These two changes will result in fewer customer complaints and fewer unauthorized charges.

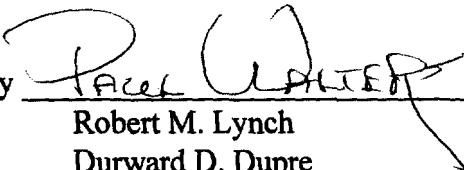
The Commission should also expand the definition of pay-per-call service to include any audio information provided through a telecommunications line or any service for which there is a charge (other than directory services provided by a common carrier or its affiliate, calls utilizing telecommunications devices for the deaf, and calls for the purchase of goods and services that are not information services). Pay-per-call services can now be accessed through voice mail. As part of a voice mail package, the end user may receive a pre-recorded pay-per-call message by depressing a number on his telephone keypad. Although this arrangement will not result in unauthorized charges if the caller is the voice mail subscriber, sometimes the caller accessing the voice mail may not be the subscriber. In those situations, the subscriber may be billed for a pay-per-call service he/she did not authorize. The Commission's rules should thus be amended to include within the definition of pay-per-call service any audio information service provided through a telecommunications line, or any telecommunications service for which the caller pays a per-call or per-time-interval charge that is greater than, or in addition to, the charge for the transmission of the call or the telecommunications service.

The Commission's Rules -- specifically Rule 64.1510(c)(1), requiring the disclaimer: "Common carriers may not disconnect local or long distance telephone service for failure to pay disputed charges for information services" -- should also be amended to permit substantially similar

disclaimers. SWBT has contractually agreed with at least one carrier to use a similar, though not identical, disclaimer. Changing the phrase will involve reprogramming and redesign of the bill. SWBT therefore requests that the rules be amended to permit existing bill phrases which convey the message that common carriers may not disconnect telephone service for failure to pay disputed information service charges.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By 
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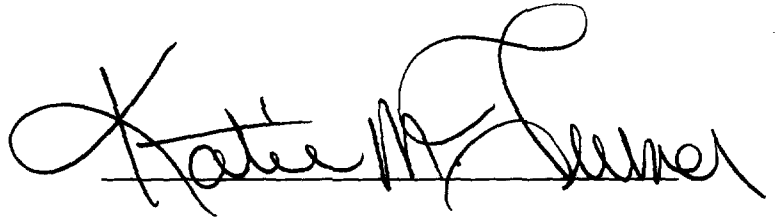
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August 26, 1996

CERTIFICATE OF SERVICE

I, Katie M. Turner, hereby certify that the foregoing, "Comments Of Southwestern Bell Telephone Company" in CC Docket No. 96-146 has been filed this 26th day of August, 1996 to the Parties of Record.

A handwritten signature in cursive script, reading "Katie M. Turner", written over a horizontal line.

Katie M. Turner

August 26, 1996

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